

## **Guide to Municipal Participation in the NRCB Review Process**

---





---

<b>INTRODUCTION</b> .....	1
NRCB REVIEW PROCESS .....	2
Project Disclosure .....	2
Identification of a Reviewable Project .....	2
Content of an Application to the NRCB .....	4
Integration of the Environmental Assessment Process .....	5
Notice of Reviewable Project .....	6
Application Deficiency Review Process .....	7
The Hearing Process .....	7
Pre-Hearing Conference .....	7
The Hearing .....	8
The Steps Toward an NRCB Decision .....	8
Municipal Land Use .....	9

---

<b>APPENDIX A:</b> <i>MUNICIPAL GOVERNMENT ACT - SECTION 619</i> .....	10
<b>APPENDIX B:</b> <i>ALBERTA ENVIRONMENTAL PROTECTION AND ENHANCEMENT ACT</i> - EIA REQUIREMENT .....	11





The Natural Resources Conservation Board (NRCB or Board) was established by the Government of Alberta to provide an impartial review process for projects that will or may affect the natural resources of Alberta. The mandate of the NRCB, as regulated by the *Natural Resources Conservation Board Act*, is to determine whether, in the Board's opinion, projects are in the public interest, having regard for their social, economic and environmental effects.

Municipalities have been active participants in past project reviews carried out by the NRCB, and their continued participation in future NRCB reviews will be even more important with recent changes to the *Municipal Government Act (MGA)*. This guide may assist municipalities affected by an NRCB reviewable project to participate in the NRCB review process.

The *MGA* (Part 17 - Planning and Development) provides for the preparation and adoption of plans and related matters: (a) to achieve the orderly, economical and beneficial development and use of land and patterns of human settlement, and (b) to maintain and improve the quality of the physical environment within which patterns of human settlement are situated in Alberta, without infringing on the rights of individuals for any public interest except to the extent that is necessary for the overall greater public interest.

The *Municipal Government Act* also provides that NRCB approvals

may affect the content of municipal statutory plans (inter-municipal development plans, municipal development plans, area structure plans, and area redevelopment plans), land use by-laws, and the municipal subdivision and development approval process.

Section 619 of the *MGA* (see Appendix A) requires municipalities to amend their statutory plans and land use by-laws to conform with approvals from the NRCB and the Alberta Energy and Utilities Board. Municipalities are to undertake any required municipal legislative actions to amend their planning instruments within ninety days of receiving an application.

**As a result of Section 619 of the *MGA*, the NRCB will require all proponents to include a detailed discussion of the municipal land use implications of the proposed project in their applications.**

The NRCB would normally assess the effects of a proposal on municipal land use. In accordance with section 620 of the *MGA*, an approval by the Board prevails over any condition of a development permit that conflicts with it.

The NRCB anticipates that proponents will work cooperatively with municipal authorities to identify and resolve land use concerns. The Board requires proponents to document those aspects of the

proposed project which may not be in conformity with local land use plans and by-laws, and indicate what steps have been taken to resolve any municipal concerns.

Given the nature of the *MGA*, the NRCB anticipates that future NRCB Decision Reports and Approvals granted for projects determined to be in the public interest, will address the land use implications of proceeding with a proposed project in explicit terms. Where the evidence indicates that municipal legislative amendments are required to accommodate a proposed reviewable project, the Board further anticipates that the NRCB Decision Reports and Approvals will likely provide sufficient direction regarding land use matters. Municipalities will then be in a position to respond appropriately to subsequent applications from NRCB Approval holders for amendments to municipal plans and by-laws.

A small number of projects will require approvals from both the NRCB and a municipality. The Board recognizes that most proposed projects will only require approvals from a municipality. In an effort to avoid duplication and to assist all participants in setting forth a functional set of practises and procedures for this small number of projects, the NRCB in consultation with municipalities has prepared this *Guide to Municipal Participation in the NRCB Review Process*.



## THE NRCB REVIEW PROCESS

### Project Disclosure

A proponent advises the NRCB of a proposal if it is for a forest industry project, a metallic or quarriable mineral project, a recreational or tourism project, or a water management project. At the same time, a proponent also notifies interested provincial departments such as Alberta Environmental Protection (AEP); Transportation and Utilities; Municipal Affairs; Public Works, Supply and Services; Agriculture, Food and Rural Development; Economic Development and Tourism; and Labour.

The proponent discusses the potential project with AEP and prepares preliminary documents so AEP can decide whether to apply the environmental assessment process.

### Identification of a Reviewable Project

Following first notification of the proposed project, the NRCB will confirm if an NRCB approval is required before starting the project.

The *Natural Resources Conservation Board Act* and the *Alberta Environmental Protection and Enhancement Act (AEPEA)* require that

the projects identified below must receive NRCB approval before starting:

- forest industry projects to construct a facility to be used to manufacture pulp, paper, newsprint or recycled fibre. Projects with a capacity of more than 100 tonnes per day require an EIA Report under the *AEPEA*.
- water management projects to construct a barrier that exceeds 15 metres, a new canal capable of conducting 15 cubic metres or more per second, a diversion capable of moving 15 cubic metres or more per second. These projects also require an EIA Report under the *AEPEA*.
- metallic or quarriable mineral projects to construct a mine or quarry producing more than 45,000 tonnes per year. These projects require an EIA Report under the *AEPEA*.
- tourism projects to construct one or more facilities for recreational or tourism purposes that are expected to attract more than 250,000 visitors per year and are immediately adjacent to an

ecological reserve, a natural area or wilderness area under the *Wilderness Areas, Ecological Reserves and Natural Areas Act*. These projects also require an EIA Report under the *AEPEA*.

For some other projects, the jurisdiction of the NRCB is determined when a discretionary decision is made under the *AEPEA* to direct the preparation of an EIA Report. NRCB approval is required to start a project if an Environmental Impact Assessment has been ordered for construction of the following projects:

- a facility to produce lumber, veneer, panel board, or treated wood;
- a mine or quarry or to work and recover any metallic mineral or quarriable mineral as defined in the *Mines and Minerals Act* and the regulations under that Act; and
- one or more facilities for recreational or tourism purposes.

The Lieutenant Governor in Council may make regulations prescribing types of projects that are reviewable or direct that a specific project is reviewable.



Summary of the general review process followed by the Natural Resources Conservation Board (NRCB):

Project Disclosure:	Conducted by the proponent to make parties aware of the proposed project and potential implications.
Confirmation of NRCB Jurisdiction:	The NRCB will determine if its approval is required to commence the project. Most projects reviewed by the NRCB are also required to prepare an Environmental Impact Assessment (EIA) under the <i>Alberta Environmental Protection and Enhancement Act (AEPEA)</i> . The NRCB's jurisdiction for some projects depends upon the requirement by the Director of Environmental Assessment, Alberta Environmental Protection (AEP) for an EIA.
Determining the Content of the NRCB Application:	The NRCB determines what information an application must contain to assess the social, economic and environmental effects of a reviewable project so that it can determine if the proposed project is in the public interest. An NRCB application must include an EIA if one is required under <i>AEPEA</i> .
Application Deficiency Review Process:	The NRCB must independently review the application and identify deficiencies, if any, in the assessment of the social, economic and environmental effects. Where an EIA has been required under <i>AEPEA</i> , the deficiency review is coordinated with AEP. The Director of Environmental Assessment must advise the NRCB that the EIA is complete to fulfill responsibilities under <i>AEPEA</i> .
The Hearing Process:	The NRCB determines if a public hearing is required. The NRCB is required to hold a hearing if a <i>bona fide</i> written objection is received from a party whom the NRCB views as being "directly affected" by the project. Normally, if a hearing is held, it will be preceded by a Pre-Hearing Conference to confirm the scope of the hearing and other issues to be addressed on preliminary and procedural matters.
The Decision:	The NRCB may, with prior authorization from Cabinet, grant an approval on any terms and conditions that the NRCB considers appropriate. The NRCB has authority to deny or defer applications. Cabinet authorization may include additional terms and conditions imposed by Cabinet.
Appeal of NRCB Decisions:	NRCB decisions may only be appealed on questions of jurisdiction or law to the Alberta Court of Appeal.



## **Content of an Application to the NRCB**

Proponents of projects of the types previously described are required to make an application for approval to the NRCB.

The Board is responsible for defining the scope and content of the information to be included in an application.

An application must provide sufficient information for the Board to determine if the proposed project is in the public interest. An application must contain the following information:

- an Environmental Impact Assessment Report containing a description and evaluation of the social, economic and environmental effects as required by Alberta Environmental Protection. (*See Appendices of the Rules of Practice*);
- a statement of the approval applied for from the NRCB;
- a statement of other approvals required to commence the proposed project, including the identification of the Acts or Regulations under which they are required;
- a description of any statutory plan and land use by-law that must be prepared or reviewed to accommodate the project and the proposed timing of these approvals;

- the reasons the proponent believes the Board should grant approval;
- the address in Alberta of the proponent's lawyer or agent to whom communications may be sent;
- the name and address of the proponent, its type of business, the location of its head office, and any other relevant aspects of its operations;
- any other information the Board may require; and
- if the application has technical reports or material attached, the technical qualification of the person(s) taking responsibility for such reports.

As a result of Section 619 of the MGA, the NRCB requires all proponents to include a detailed discussion of the municipal land use implications of the proposed project in their applications. Every application to the NRCB must include sufficient background information to allow the Board to assess the effects on municipal land use, including effects on municipal development plans, area structure plans, land use by-laws and other municipal by-laws. Information will also be required on any proposed subdivision plans, development agreements and conformance with development standards and codes.

The NRCB anticipates that proponents will work cooperatively with municipal authorities to identify and resolve land use concerns. The Board requires proponents to document those aspects of the proposed project which may not be in conformity with municipal plans and by-laws, and indicate what steps have been taken to resolve any concerns. Where municipal concerns remain outstanding, the NRCB requires proponents to furnish evidence explaining:

- why the matter remains unresolved;
- what solutions have been proposed to resolve the matter by the proponent and/or the municipality;
- what steps or actions are required to conclude the matter; and
- any recommended action that might form part of any Approval should the NRCB conclude the proposed project is in the public interest.





## Integration of the Environmental Assessment Process

The provincial environmental assessment process administered by Alberta Environmental Protection, which may include an Environmental Impact Assessment Report, is intended to:

- support the goals of environmental protection and sustainable development;
- integrate environmental protection and economic decisions at the earliest stages of planning an activity;
- predict the environmental, social, economic and cultural activity and to assess plans to mitigate any adverse impacts resulting from the proposed activity; and
- provide for the involvement of the public, proponents, department of the government and government agencies in the review of proposed activities.

In providing a report which addresses the purposes of the environmental impact assessment process, the EIA Report contains information on the social, economic and environmental effects anticipated from the project. In doing so, the EIA Report assists the Board in its determination of whether the project is in the public interest.

Specific terms of reference are issued by the Director of Environmental Assessment for each

EIA Report following a period of public notice and review. Companies must carry out a public consultation program as part of their EIA Report preparation. The results of this program are submitted as part of the EIA Report and include a summary of the views of interested or affected persons.

The NRCB and Alberta Environmental Protection expect that proponents will work cooperatively with the public to identify and resolve concerns pertaining to the social, economic and environmental effects of the proposed project. An *Analysis of Issues* will be required as part of the EIA Report. It will outline those aspects of the proposed project which were identified as issues by the public during the preparation of the application and which the proponent believes have been resolved through adjustments in the proposal or through other means.

In their Board submission, applicants must also outline those aspects of the proposed project which were identified as issues by the public and which the proponent believes have not or cannot be resolved prior to an NRCB public hearing. The NRCB requires the applicant to provide an analysis of the prospects for the resolution of each issue or public concern that remains unresolved at the time the application is submitted to the Board. The analysis should include:

- a clear description of the issue and the perspectives of the parties in dispute;

- an account of efforts at resolution, including any solutions proposed and the reasons why they have not been adopted;
- an assessment of what would be required to conclude the matter; and
- any recommendations the applicant may have as to how the Board might deal with the issue in its decision.

Applicants should identify and record public interest issues raised through the development of the application and during the environmental assessment process and this record will become a key document during the subsequent public hearing process.

The NRCB recognizes that at the earliest stages of the review process, key decisions are made by the proponent about the scope and scale of the EIA Report, the issues to be addressed in the assessment, and the kinds of information that must be obtained to address those issues. These decisions shape the subsequent NRCB review and public hearing of the application. The public plays an essential role in these early stages of the review process. By raising issues and commenting on the NRCB application requirements, the public helps to ensure that no relevant issues of concern are omitted in the NRCB review and decision-making process.



## Notice of Reviewable Project

When a project is reviewable by the NRCB and the proponent has been directed to prepare and submit an EIA, the Director of Environmental Assessment will require proponents, when publishing notice of the proposed terms of reference for the EIA under AEPEA, to include a statement that:

- the proposed project will be reviewed by the NRCB;
- the NRCB will require that the EIA Report be included as part of the NRCB application;
- the terms of reference for the EIA Report include information to assist the NRCB in considering the public interest.

The Director will forward statements of concern received on the terms of reference to the NRCB. Written comments on the NRCB application requirements beyond the EIA Report will also be forwarded.

Written comments from any affected municipality on the NRCB application requirements and draft terms of reference for the EIA would identify the information needed to assess municipal effects.

The nature of the proposed project will also determine the need for the proponent to provide information regarding specific municipal legislative changes that may be required if the project is to be approved.

If the project is near the boundary of a municipality, then the

adjacent municipality might also wish to be notified by a proponent and participate in the NRCB review process. The Board requests that proponents notify neighbouring municipalities of new developments or subdivision changes near to municipal boundaries.

*It is important that a municipality identify its concerns at this stage of the review process to allow the proponent to provide all of the necessary information regarding municipal effects in the most cost effective and efficient manner.*

***To ensure municipal information needs are also met in the development of the terms of reference for an EIA, a municipality may wish to consider the following:***

- air emissions;
- natural environment of the area;
  - vegetation;
  - wildlife;
  - ecological linkages;
  - natural environment and habitat;
  - local climate;
  - suitability of the site;
  - surrounding land uses;
- noise;
- surface run-off and drainage;
- ground water flows and potential contamination;
- soil contamination;
- agricultural capability;
- traffic movement in the area;
- impacts on immediate and surrounding area;
- potential population growth;
- potential housing needs;
- servicing requirements;
- spin-off growth;
- construction and operational impacts on existing services:
  - sewerage;
  - water;
  - waste products, disposal, storage and treatment;
  - power needs;
  - fire, police, social services.



A municipality may wish to respond to the NRCB's application requirements and draft EIA Report terms of reference outlining any concerns regarding the following:

- the potential for effects on the municipality (positive or negative);
- additional areas that the EIA Report should cover to assist the municipality in its decision-making process;
- areas where the municipal statutory plans and land use by-laws might be affected; and
- additional information that should be included to assess municipal effects.

The Director of Environmental Assessment issues final terms of reference to the proponent for the preparation of the EIA report.

The NRCB reviews any comments received from the public and the proponent regarding the NRCB application. The NRCB application requirements will include the final terms of reference for the EIA Report issued by the Director of Environmental Assessment. The Board may require additional information and will issue confirmation of the NRCB application requirements to satisfy an assessment of the proposed project.

### **Application Deficiency Review Process**

When an application is filed with the NRCB, the NRCB provides notice to interested parties that an application has been filed and is being reviewed to determine its completeness.

The *Preliminary Notice of Application* may indicate:

- that an application has been received;
- what is being proposed;
- the scale of the project;
- the location of the proposed project;
- who to contact for information;
- the date to register as an interested party to receive further information; and
- the role of the NRCB.

A municipality should review NRCB application documents and advise the Board of any concerns and issues in writing. A municipality should identify deficiencies in the assessment of the potential municipal impacts in order to assist in a review of the application. The nature of the project will likely determine specific areas of municipal interest worthy of consideration during the deficiency review process.

Members of the general public interested in the application are also encouraged to write to the NRCB identifying any concerns about the completeness of information contained in the application. If

necessary, the NRCB can require the proponent to provide additional information on specific issues.

---

### **The Hearing Process**

It is the Board's responsibility to determine if a hearing is required. The Board expects that, given the complex nature of most reviewable projects, a public hearing would assist it to determine the public interest.

If a hearing is required, the NRCB would complete its deficiency review of the application and hold its Pre-Hearing Conference.

---

### **Pre-Hearing Conference**

The NRCB determines whether a Pre-Hearing Conference is needed to discuss preliminary and procedural matters and the date, time and location for a Pre-Hearing Conference. This decision would include consideration of the status of the proponent's response to any requests for additional information; whether the proponent has made its application available to the public; whether a municipality has advised the NRCB of any outstanding concerns; and the nature and extent of issues, concerns, and any specific requests from the public.

Before holding a Pre-Hearing Conference, the NRCB will issue a *Notice of Pre-Hearing Conference* setting out:

- date, time and location of the Pre-Hearing Conference;
- a description of the subject of the application and proceedings;



- the location(s) where the application can be viewed;
- the requirements for directly affected persons who wish to apply for intervener funding and the requirements for submissions; and
- the date, time and address for receipt of submissions.

The Board has prepared a separate *Guide to the Pre-Hearing Conference* for submission specifics.

Following the Pre-Hearing Conference the NRCB normally issues a written *Report of Pre-Hearing Conference* confirming the scope of the review; the time, place and date for the commencement of the hearing; and the Board's decision regarding intervener funding awards, if applicable.

## The Hearing

A *Notice of Hearing* is issued in regional and local newspapers at least thirty days prior to the hearing. All of the items contained in the *Notice of Pre-Hearing Conference* are set out in this notice except the item related to intervener funding.

At the hearing the following events can be expected:

- the Chairman of the Board sets out meeting rules, and deals with preliminary matters relative to hearing;
- submissions are made by the applicant, municipalities and other participants and are followed by cross-examination;
- the applicant is then provided the opportunity to present rebuttal evidence;

- final arguments delivered in the same order as submissions - with the applicant last.

It is emphasized that the hearing is the primary opportunity for municipalities to participate in the NRCB review process. Please refer to the *NRCB Hearing Guide* for submission specifics. Each registered municipal participant has the opportunity to present evidence and cross-examine on municipal matters relevant to the NRCB review. Municipal interventions adopted through Municipal Council resolution could address the following issues, amongst others:

- the impact on the municipality, including such areas as population growth, housing requirements, recreation and school needs, and servicing demands;
- the location of the project in relation to other land uses;
- potential transportation needs;
- potential servicing needs;
- views of Council and local residents regarding the proposal; and
- potential positive and negative environmental impacts.

In addition, the NRCB would appreciate evidence regarding the need for any specific municipal legislation changes that might be required should the proposed project receive approval, including:

- possible adjustments to the municipal development plan and land use by-law;

- adjustments to, or complete preparation of, an area structure plan;
- adjustments to other municipal legislation.

The Board reviews all written submissions and evidence submitted at the hearing prior to arriving at its decision. ***As the NRCB is a quasi-judicial tribunal, only evidence brought forward during the hearing can be considered by the Board in arriving at its final decision.***

## The Steps Toward an NRCB Decision

The next steps in the process are as follows:

- the NRCB issues its Decision Report;
- the NRCB will approve or deny an application (if approved, then with or without conditions as appropriate);
- if approved, the Lieutenant Governor in Council's (Cabinet's) authorization is required;
- if approved by Cabinet, Cabinet formally authorizes the Board to issue an approval;
- the NRCB issues its approval following the *Form of Approval* contained in the Board's Decision Report, including any additional conditions that may be required by Cabinet.

In the event that no hearing is required, the above steps would occur.





*Given the nature of the Municipal Government Act, the NRCB anticipates that future NRCB Decision Reports and Approvals granted for projects determined to be in the public interest, will address the land use implications of proceeding with a proposed project in explicit terms. Where the evidence indicates that municipal legislative amendments are required to accommodate a proposed reviewable project, the Board further anticipates that the NRCB Decision Reports and Approvals will likely provide sufficient direction regarding land use matters so that municipalities will be in a position to respond appropriately to subsequent applications from NRCB Approval holders for changes in municipal plans and by-laws.*

## Municipal Land Use

Following Cabinet authorization of the NRCB decision to approve an application, the municipality has land use planning responsibilities. Where the municipal development plan, area structure plan(s) and land use by-law(s) could accommodate the proposed project, the proponent would proceed to obtain subdivision and/or development approvals from the municipality in a manner consistent with the MGA.

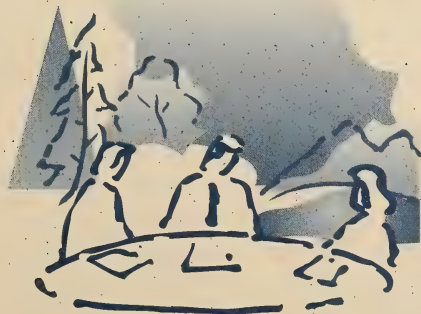
Where a municipal development plan, area structure plan or land use by-law requires amendment to accommodate the proposed project, the proponent would proceed to request the necessary changes prior to applying for subdivision and/or development approvals from the municipality. The municipality would consider such a request in light of the MGA provisions which require the municipality, on application from the holder of an NRCB Approval, to amend the statutory plans and land use by-laws to conform to Cabinet authorized NRCB Approvals.

The proponent may appeal, to the Municipal Government Board, the decision of the municipality on a proposed amendment to a statutory plan or land use by-law if it appears not to comply with the NRCB's Approval as authorized by Cabinet.

**This guide has been prepared to assist participants to understand the process that would be applicable to most NRCB reviews. It is important to remember that this guide is intended to provide general information and that the Board may choose to vary the general practice on a review specific basis.**

### Other publications:

- NRCB Act
- NRCB Rules of Practice
- The NRCB Pre-Hearing Conference
- The NRCB Hearing
- Guide to Intervener Funding
- Guide to the NRCB Process



*Municipalities have been active participants in past project reviews carried out by the NRCB, and their continued participation in future NRCB reviews will be even more important with recent changes to the Municipal Government Act (MGA).*



## APPENDIX A: MUNICIPAL GOVERNMENT ACT - SECTION 619

- 619(1) A licence, permit, approval or other authorization granted by the NRCB, ERCB or AEUB prevails, in accordance with this section, over any statutory plan, land use by-law, subdivision decision or development decision by a subdivision authority, development authority, subdivision and development appeal Board, or the Municipal Government Board or any other authorization under this Part.
- (2) When an application is received by a municipality for a statutory plan amendment, land use by-law amendment, subdivision approval, development permit or other authorization under this Part and the application is consistent with a licence, permit, approval or other authorization granted by the NRCB, ERCB or AEUB, the municipality must approve the application to the extent that it complies with the licence, permit, approval or other authorization granted under subsection (1).
- (3) An approval of a statutory plan amendment or land use by-law amendment under subsection (2)
- (a) must be granted within 90 days of the application or a longer time agreed on by the applicant and the municipality, and
  - (b) is not subject to the requirements of section 692 unless, in the opinion of the municipality, the statutory plan amendment or land use by-law amendment relates to matters not included in the licence, permit, approval or other authorization granted by the NRCB, ERCB and AEUB.
- (4) If a municipality that is considering an application under subsection (2) holds a hearing, the hearing may not address matters already decided by the NRCB, ERCB or AEUB except as necessary to determine whether an amendment to a statutory plan or land use by-law is required.
- (5) If a municipality does not approve an application under subsection (2) to amend a statutory plan or land use by-law or the municipality does not comply with subsection (3), the applicant may appeal to the Municipal Government Board by filing a notice of appeal with the Board.
- (6) The Municipal Government Board, on receiving a notice of appeal under subsection (5),
- (a) must commence a hearing within 60 days of receiving the notice of appeal and give a written decision within 30 days of concluding the hearing, and
  - (b) is not required to notify or hear from any person other than the applicant and the municipality against whom the appeal is launched.
- (7) The Municipal Government Board, in hearing an appeal under subsection (6), may only hear matters relating to whether the proposed statutory plan or land use by-law amendment is consistent with the licence, permit, approval or other authorization granted under subsection (1).
- (8) In an appeal under this section the Municipal Government Board may
- (a) order the municipality to amend the statutory plan or land use by-law in order to comply with a licence, permit, approval or other authorization granted by the NRCB, ERCB or AEUB, or
  - (b) dismiss the appeal.
- (9) Section 692 does not apply when the statutory plan or land use by-law is amended pursuant to a decision of the Municipal Government Board under subsection (8)(a).
- (10) A decision under subsection (8) is final but may be appealed by the applicant or the municipality in accordance with section 688.
- (11) In this section "NRCB, ERCB or AEUB" means the Natural Resources Conservation Board, Energy Resources Conservation Board or Alberta Energy and Utilities Board.



## APPENDIX B: ALBERTA ENVIRONMENTAL PROTECTION AND ENHANCEMENT ACT - EIA REQUIREMENT

Under the *AEPEA* section 47, an EIA report is to include the following information unless the Director provides otherwise:

- |  |   |  |
|--|---|--|
| (a) a description of the proposed activity and an analysis of the need for the activity;   | (e) an analysis of the significance of the potential impacts identified under clause (d);   | (k) the plans that have been or will be developed for waste minimization and recycling;  |
| (b) an analysis of the site selection procedure for the proposed activity, including a statement of the reasons why the proposed site was chosen and a consideration of alternative sites;               | (f) the plans that have been or will be developed to mitigate the potential negative impacts identified under clause (d);   | (l) the manner in which the proponent intends to implement a program of public consultation in respect of the undertaking of the proposed activity and to present the results of that program; |
| (c) an identification of existing baseline environmental conditions and areas of major concern that should be considered;  | (g) an identification of issues related to human health that should be considered;  | (m) the plans that have been or will be developed to minimize the production or the release into the environment of substances that may have an adverse effect;                                |
| (d) a description of potential positive and negative environmental, social, economic and cultural impacts of the proposed activity, including cumulative, regional, temporal and spatial considerations; | (h) a consideration of the alternatives to the proposed activity, including the alternative of not proceeding with the proposed activity;   | (n) the final terms of reference issued by the Director under section 46(3);   |
|  | (i) the plans that have been or will be developed to monitor environmental impacts that are predicted to occur and the plans that have been or will be developed to monitor proposed mitigation measures; | (o) any other information that the Director considers necessary to assess the proposed activity.   |
|  | (j) the contingency plans that have been or will be developed in order to respond to unpredicted negative impacts;  |  |



---

## NOTES









For more information please call:

**NRCB**

11th Floor, Pacific Plaza  
10909 Jasper Avenue  
EDMONTON, AB T5J 3L9



Natural Resources  
Conservation Board

May 1996

ISBN 0-7732-1909-2

Telephone: (403) 422-1977

Fax: (403) 427-0607

Internet: <http://www.gov.ab.ca/~nrCB>

*If you are calling from outside of  
Edmonton, please use the  
Government RITE line.*

